REMARKS

Claims 1-6 and 8-22 are pending in the above-captioned application. Claim 7 has been

cancelled. Claims 1-5 and 14-22 have been withdrawn from consideration. Claims 6, 8, and 12

have been amended. Claims 1, 6, 14, and 16 are in independent form.

Claims 6-8, 12, and 13 have been rejected under 35 U.S.C. § 103(a) as being

unpatentable over United States Patent Application Publication No. 20020195736 to Potter ("the

'736 reference") in view of United States Patent 3,548,451 to Carmi ("the '451 reference") and

Japanese reference JP-2003001634 to Hirose ("the '634 reference"). Applicant respectfully

traverses the rejection.

Claim 6 of the above-captioned application claims a rack pin substantially at a right angle

to a cylinder shaft. The cited references do not teach or suggest positioning a rack pin

substantially at a right angle to a cylinder shaft. According to the Examiner, the '634

reference teaches a molding device including a rack and pinion 60, 70 that are used to actuate a

rack 50 that drives the movement of an undercut mold 40. However, reference to the Figures of

the '634 reference reveals that the rack 50 and the rack 60 are generally parallel to one another.

It is, therefore, clear that the rack 50 and the rack 60 are not substantially at a right angle from

one another. Moreover, there is no motivation or suggestion in the cited references for

positioning a rack pin substantially at a right angle to a cylinder shaft. Therefore, claim 6, as

amended, is not unpatentable in view of the cited references.

Claims 8, 12, and 13 depend from claim 6 and, as such, must be construed to incorporate

by reference all the limitations of the claim to which they refer, see 35 U.S.C. §112, fourth

paragraph. Each of claims 8, 12, and 13 must be read as including the limitation of a rack pin

substantially at a right angle to a cylinder shaft. Thus, claims 8, 12, and 13 are allowable for the

reasons set forth above.

Therefore, Applicant respectfully requests that the rejection of claims 6-8, 12, and 13

under 35 U.S.C. § 103(a) as being unpatentable over the '736 reference in view of the '451

reference and the '634 reference be withdrawn.

6

Appl'n No. 10/581,138 Response dated Sept. 25, 2009

Reply to Office action dated July 21, 2009

The Examiner has rejected claims 9-11 under 35 U.S.C. § 103(a) as being unpatentable

over the '736 reference and the '634 reference and further in view of United States Patent

4,114,759 to Maloney ("the '759 reference"). Applicant respectfully traverses the rejection.

Claims 9-11 of the above-captioned application depend from claim 6 and, as such, must

be construed to incorporate by reference all the limitations of the claim to which they refer, see

35 U.S.C. §112, fourth paragraph. Each of claims 9-11 must be read as including the limitation

of a rack pin substantially at a right angle to a cylinder shaft. None of the cited references,

including the '759 reference, discloses a rack pin substantially at a right angle to a cylinder shaft.

Further, the cited references do not provide any teaching or motivation for positioning the rack

pin substantially at a right angle to a cylinder shaft. Thus, claims 9-11 are allowable for the

reasons set forth above.

Therefore, Applicant respectfully requests that the rejection of claims 9-11 under 35

U.S.C. § 103(a) as being unpatentable over the '736 reference in view of the '634 reference and

in further view of the '759 reference be withdrawn.

It is respectfully submitted that this patent application is in condition for allowance, which

allowance is respectfully solicited. If the Examiner has any questions regarding this amendment or

the patent application, the Examiner is invited to contact the undersigned.

Respectfully submitted,

Clark Hill PLC

500 Woodward Avenue, Suite 3500

Detroit, MI 48226-3435

(313) 965-8897

7